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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SUNBEAM PRODUCTS, INC., d/b/a
Jarden Consumer Solutions, a Delaware
corporation,

Plaintiff,

v.

OLISO, INC. a California corporation,
Defendant.

CASE NO. CV 3:13-cv-03577-SI

**JOINT STIPULATION TO
CONTINUE ALL DEADLINES
PENDING COMPLETION OF
SETTLEMENT AGREEMENT**

The Honorable Susan Illston

Pursuant to Civil L.R. 6-2 and 7-1(a)(2), Plaintiff Sunbeam Products, Inc. d/b/a Jarden Consumer Solutions (“Sunbeam”) and Defendant Oliso, Inc. (“Oliso”) hereby jointly request that the Court extend all pending deadlines for 45 days to allow the parties to complete a settlement agreement reflecting settlement terms upon which the parties have reached agreement. In support of this request, the parties state the following:

1. The parties participated in mediation on October 29, 2014. (Dkt. No. 65.) Although the parties did not settle the case at the mediation, they continued to discuss settlement.

2. The parties have reached agreement on settlement terms and have begun drafting a settlement agreement, and they anticipate filing a notice of voluntary dismissal on or before March 20, 2015.

3. Accordingly, the parties jointly request that the Court extend the pending deadlines as follows to provide them sufficient time to finalize a settlement agreement and meet the terms thereof:

Who	Event	Presently Scheduled Date	Proposed Date
Parties	to complete Claim Construction Discovery (L.R. 4.3)	<i>February 16, 2015</i>	<i>April 2, 2015</i>
Plaintiff	to file Opening Claim Construction Briefs (L.R. 4-5a)	<i>March 2, 2015</i>	<i>April 16, 2015</i>
Defendant	to file Responsive Claim Construction Briefs (L.R. 4-5b)	<i>March 16, 2015</i>	<i>April 30, 2015</i>
Plaintiff	to file Reply Claim Construction Briefs (L.R. 4-5c)	<i>March 23, 2015</i>	<i>May 7, 2015</i>
Parties	to conduct Technology Tutorial (if needed)	<i>N/A</i>	<i>N/A</i>

Who	Event	Presently Scheduled Date	Proposed Date
Court, Parties	to conduct and participate in Claim Construction Hearing	<i>April 22, 2015</i>	TBD (pursuant to Court's schedule)
Parties	to complete Fact Discovery	TBD	TBD
Parties	to serve Expert Reports	TBD	TBD
Parties	to serve Expert Rebuttal Reports	TBD	TBD
Parties	to complete Expert Discovery	TBD	TBD
Parties	to file Dispositive Motions	TBD	TBD
Court	to conduct hearing on Dispositive Motions	TBD	TBD
Court, Parties	to conduct and participate in Final Pretrial Conference	TBD	TBD
Court, Parties	To conduct and participate in Jury Trial	TBD	TBD

4. This limited continuance is for good cause. The parties are not submitting this request for the purposes of delay but, rather, so that they may have sufficient time to finalize a settlement agreement and complete the terms of the agreement, and dismiss this matter forthwith in its entirety.

1 Dated: February 12, 2015

Respectfully Submitted,

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3 /s/ Kevin J. O'Shea

/s/ Brian E. Mitchell

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CERTIFICATE OF SERVICE

Pursuant to Local Civil Rule 5-1, I hereby certify that a true and correct copy of the foregoing document has been served upon all counsel of record via the Court's CM/ECF system on **February 12, 2015**.

/s/ Nicholas A. Brown
Nicholas A. Brown